

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**ROBERT T. BROCKMAN**

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§

**Criminal No. 4:21-cr-00009**

**DECLARATION OF KATHRYN KENEALLY**

I, Kathryn Keneally, declare as follows:

1. I am a member of the bar of the State of New York, the United States Supreme Court, and various other federal courts. I am a partner of the law firm Jones Day, counsel for the defendant Robert T. Brockman. I make this Declaration in support of Defendant Robert T. Brockman's Partial Opposition to the Government's Motion for Discovery Order Under Rule 17(c) and 45 CFR 14.512(e)(1)(i).

2. Attached hereto as Exhibit 1 is a copy of the April 9, 2020 letter from counsel to the government and attachments to the letter, including diagnostic medical reports from three doctors, letters from three doctors, and a forensic report.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York on February 10, 2021.

  
Kathryn Keneally